

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON**

<b>IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No. 2:12-MD-02327 MDL 2327</b>  <b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>
<b>THIS DOCUMENT RELATES TO ALL CASES</b>	

**CROSS NOTICE OF 30(b)(6) VIDEO DEPOSITION REGARDING REVISED TVT  
IFU'S AND REVISED GYNEMESH PS IFU**

**TO: ALL COUNSEL OF RECORD**

**PLEASE TAKE NOTICE** that the 30(b)(6) deposition will be taken jointly in connection with *In Re: Ethicon, Inc., Pelvic Repair System Products Liability Litigation*, MDL No. 2327, United States District Court, Southern District of West Virginia at Charleston and *In Re Pelvic Mesh/Gynecare Litigation*, Superior Court of New Jersey, Bergen County, Master Case 6341-10, Case No. 291, upon oral examination at Riker Danzig Scherer Hyland Perretti LLP, Headquarters Plaza, One Speedwell Avenue, Morristown, New Jersey, 07962, beginning November 12, 2015, at 9:30 a.m. and continuing from day to day until completion.

**PLEASE TAKE FURTHER NOTICE** that in accordance with Rule 30 of the Federal Rules of Civil Procedure, the procedures set forth *In Re: Ethicon Inc., Pelvic Repair System Products Liability Litigation*, MDL No. 2327, Defendants Ethicon Inc. and Johnson & Johnson hereby cross-notice this deposition for any and all purposes permitted by the Federal Rules of Civil Procedure, the rules of the MDL Court, and any other state or local rules that apply to this action. Defendants Ethicon, Inc. and Johnson & Johnson further state that this

deposition shall be conducted in accordance with and subject to the Protective Orders entered in  
*In Re: Ethicon Inc., Pelvic Repair System Products Liability Litigation*, MDL No. 2327.

This deposition will be taken before a person authorized by law to administer  
oaths and video-taped.

Dated: November 4, 2015

Respectfully submitted,

/s/Christy D. Jones  
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COUNSEL FOR DEFENDANTS  
ETHICON, INC. AND  
JOHNSON & JOHNSON

**CERTIFICATE OF SERVICE**

I hereby certify that on November 4, 2015, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to CM/ECF participants registered to receive service in this MDL.

/Christy D. Jones  
Christy D. Jones